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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

AARON RAY FETTERS,

Defendant.

Case: 2:23-cr-20345
Judge: Berg, Terrence G.
MJ: Grand, David R.
Filed: 06-14-2023 At 12:52 PM
SEALED MATTER (SS)

VIOLATIONS:

18 U.S.C. §§ 2251(a), (e)

18 U.S.C. § 2252A(a)(2)(A)

18 U.S.C. § 2252A(a)(5)(B)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. §§ 2251(a) and (e)
Sexual Exploitation of Children

On or about March 2, 2017, in the Eastern District of Michigan, the defendant, AARON RAY FETTERS, employed, used, persuaded, induced, enticed and coerced Minor Victim One, a female born in 2001, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct; knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported using a means and

facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

18 U.S.C. §§ 2251(a) and (e)

Attempted Sexual Exploitation of Children

On or about November 24, 2017, in the Eastern District of Michigan, the defendant, AARON RAY FETTERS, employed, used, persuaded, induced, enticed and coerced, and attempted to employ, use, persuade, induce, entice, and coerce Minor Victim One, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct; knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported using a means and facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT THREE

18 U.S.C. § 2252A(a)(2)(A)

Distribution of Child Pornography

From on or about August 3, 2022 to on or about August 9, 2022, in the Eastern District of Michigan, the defendant, AARON RAY FETTERS, knowingly distributed child pornography, as defined in 18 U.S.C. § 2256(8); and the images

distributed by the defendant had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT FOUR
18 U.S.C. § 2252A(a)(5)(B)
Possession of Child Pornography

On or about March 7, 2023, in the Eastern District of Michigan, the defendant, AARON RAY FETTERS, knowingly possessed material that contained child pornography, as defined in 18 U.S.C. § 2256(8)(A), which involved a prepubescent minor and a minor who had not attained 12 years of age, that had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, including a computer, and was produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including a computer, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION
18 U.S.C. § 2253
Criminal Forfeiture

The allegations of this Indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section

2253.

If convicted of an offense charged and set forth above, AARON RAY FETTERS, shall forfeit to the United States:

- a. any visual depiction described in section 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Substitute Assets. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), the defendant shall forfeit substitute property, up to the value of the property described above, if, by any act or omission of the defendant, the property described above cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property

which cannot be divided without difficulty.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/Brandy R. McMillion
BRANDY R. McMILLION
Chief, General Crimes Unit
Assistant United States Attorney

s/Diane N. Princ
DIANE N. PRINC
Assistant United States Attorney

s/Christopher W. Rawsthorne
CHRISTOPHER W. RAWSTHORNE
Assistant United States Attorney

Dated: June 14, 2023

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United States District Court
 Eastern District of Michigan

Criminal Case Cc

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>CW</i>

Case Title: USA v. AARON RAY FETTERS

County where offense occurred : Jackson

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/___ Information --- no prior complaint.
 ___ Indictment/___ Information --- based upon prior complaint [Case number: _____]
 ___ Indictment/___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 14, 2023

Date

[Signature]
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.